Summary:

In this paper, the NYNEX Telephone Companies (NTCs), explain their position concerning the use of a POT Bay as a point of termination within an NTC Serving Wire Center.

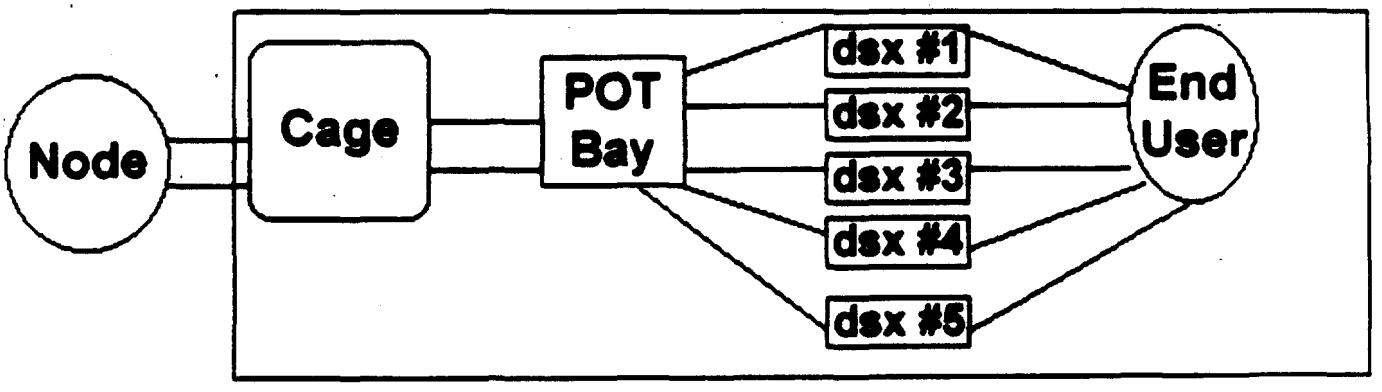
A recent news release issued by Teleport Communications Group (TCG), entitled "The POT Bay: Several BOCs Attempt to Obstruct Interconnection ...Again," has prompted the NTCs to explain, once again, the rationale behind the use of a POT Bay.

We believe at the conclusion of this paper, that you will understand why the POT Bay is necessary in a physical collocation arrangement and the NTCs charges in connection with the POT Bay are just and reasonable.

The NYNEX definition of a POT Bay:

A POT Bay serves as a termination point for each type of service ordered by the interconnector (i.e DS1, DS3). As the NTCs began developing their methods and procedures for implementing physical collocation, it became apparent that establishing a single point of termination in the central office, where the interconnector could obtain access to all of the services desired, was the most efficient way to provide these services.

The POT is established at or near the multiplexing node. This allows each interconnector to perform its activities at a single location.



Interconnector Maintains Control:

The interconnector has control over cross connects at the Point of Termination (POT) that is installed at the multiplexing node as the point of demarcation between the LEC and the interconnector. Thus, the interconnector can control channel assignments at three points; at the POT Bay, inside the multiplexing node, or at the interconnectors' node in its own network. The NTCs have used the same channel assignment procedures in the state expanded interconnection arrangements since April, 1991 without problems for either the NTCs or interconnectors.

Alternatives to the POT Bay:

As an alternative to the POT Bay, TCG suggests that LECs allow interconnectors to connect directly to the LECs Main Distribution Frame (MDF). This is an inefficient practice. For example, at one NTC location, if the interconnector was permitted to designate multiple points of termination, the NTCs might have to establish up to 30 demarcation point locations by assigning frame termination space on any of twenty-three possible frames located on various floors throughout the building. This process would burden the interconnector with increased costs for LEC escorts as well as increased maintenance fees. The following example illustrates the potential number of demarcation points within the New York Telephone Broad St. location.

Alternatives to the POT Bay: (continued)

Frame Type	No. of Pos. Frames	Termination Levels	No. of Demarcation Points
DSX-1	5	DS1	5
DSX-3	3	DS3	3
Subscriber MDF	4	DS0	4
Tie Pair DF	4	DS0	4
Trunk MDF	2	DS0,DS1	4
Toll DF	4	DS0,DS1	8
Special Service DF	2	DS0,DS1	2
Total	23		30

Without a POT Bay, interconnectors could potentially have to check many demarcations points within one central office to isolate trouble. The POT Bay eliminates this excessive cost burden, and inefficiency for both the interconnector and the NTC.

Not a New Issue:

This issue was raised by TCG during the course of the New York State Public Service Commission's (NYSPSC) deliberations over New York Telephone's (NYT) OTIS II tariff. The NYSPSC, in responding to TCGs comments on the POT Bay, stated "The vague references by Teleport to the possibility of operational difficulties, is clearly overshadowed by NYT's explanation of the additional operational benefits of having one point of interconnection for each facility type in every central office." (1)

(1) State of New York Public Service Commission Order Regarding OTIS II Compliance Filing Issued and Effective May 8, 1991.

Cost the
True Story:

In their POT Bay paper, TCG states that "the POT Bay unnecessarily adds exorbitant costs to interconnection." TCG compares the rates of the NTCs to those charged by other carriers. The NTCs' charges are not unjust and unreasonable. The NTCs do not charge a non-recurring charge for the construction of a POT Bay, while their recurring rate is included as part of the monthly Office Channel Termination charge (OCT). For example, currently, a DS1 OCT is $6.16, of this OCT, the POT Bay comprises about 60% of the cost of the OCT, or $3.70.

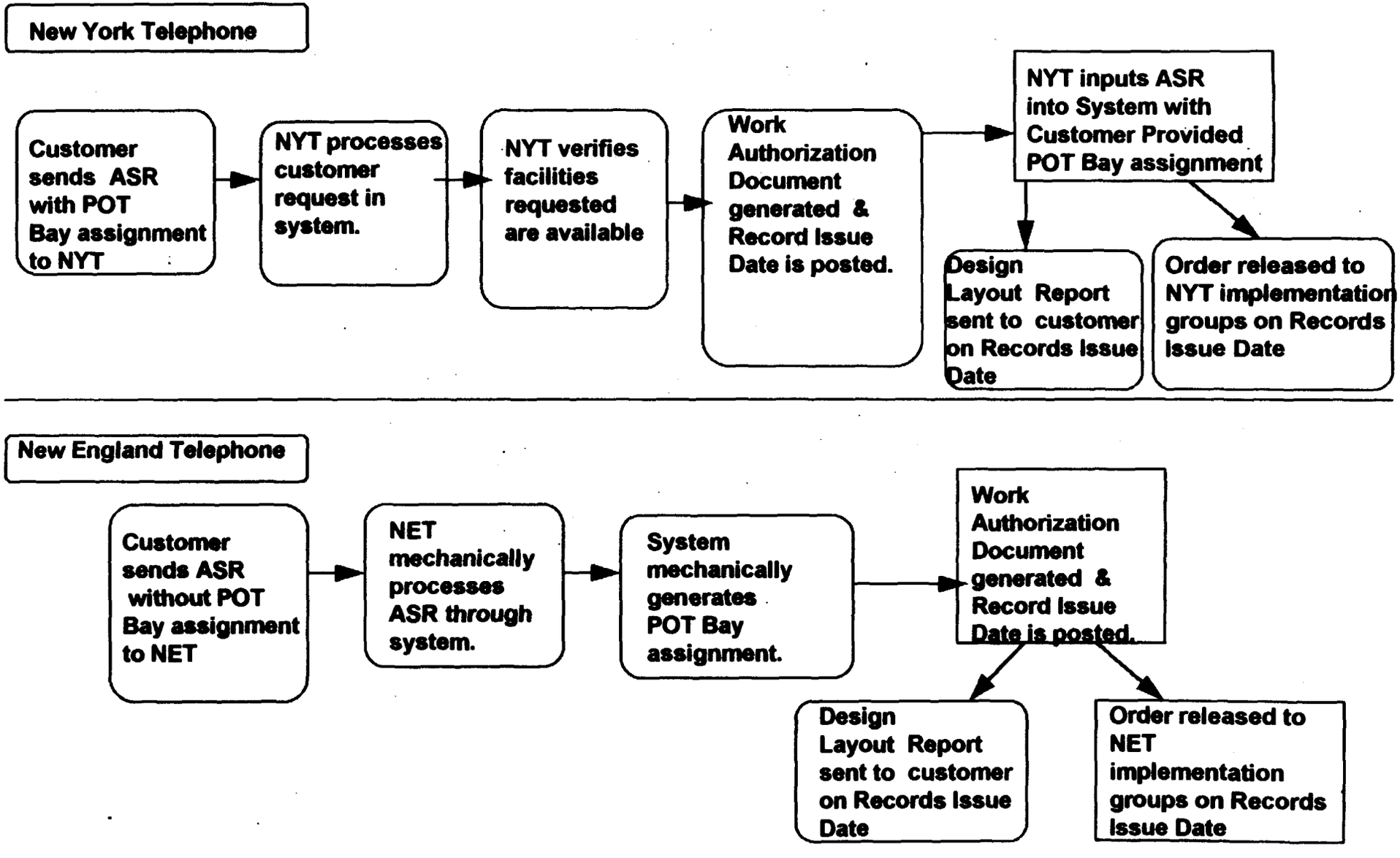
TCG also claims that since nothing is regularly "done" by the LEC to the POT Bay, they see no justification for a recurring charge. In fact, monthly recurring charges for the use of equipment are established to recover the investment costs and related overheads associated with that equipment. Whether something is regularly "done" to that equipment is irrelevant.

What Next?

The NTCs have been a leader in opening the doors to competition in both the intralata and interlata markets. The POT Bay is not an unnecessary element and serves an essential purpose for both the interconnector and the NTCs. The NTCs will continue to meet the needs of our interconnector customers and work within the given regulatory framework to accomplish these goals.

The NYNEX Telephone Companies-Channel Assignment Process for both Interexchange Carriers & Interconnectors

Attachment M



Key:
ASR=Access Service Request

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing DIRECT CASE OF THE NYNEX TELEPHONE COMPANIES, was served by first class United States mail, postage prepaid, on each of the parties indicated on the attached service list, this 20th day of August, 1993.

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